

Erin S. Greenawald, OSB#990542
Erin@greenawaldlaw1.com
Sean J. Riddell, OSB#013943
sjr@seanriddellpc.com
2905 NE Broadway St.,
Portland, OR 97232
Phone: 971 219 8453
Facsimile: 971 302 7061
Attorneys for Plaintiff

Jonathan Mansfield, OSB # 055390
john_mansfield@washingtoncountyor.gov
155 N. First Avenue
Hillsboro, OR 97124
Phone: 971 401 6915
Attorney for Washington County

Eliot Thompson, OSB# 160661
Eliot.Thompson@doj.oregon.gov
Kelly Burris, OSB# 133176
Kelly.C.Burris@doj.oregon.gov
1162 Court Street NE
Salem, OR 97301-4096
Phone: (503) 947-4700
Attorneys for State of Oregon

Christopher Piekarski, OSB# 000910
chrisp@theglb.com
Damian Stutz, OSB# 13175
damian@theglb.com
7455 SW Bridgeport Road, Suite 235
Tigard, OR 97224
Phone: 971 312 0660
Attorneys for Vigilnet

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

Portland Division

ESTATE OF GABRIELA JIMENEZ, by and
through its Personal Representative ELLEN
DELGADO,

Plaintiff,

vs.

VIGILNET AMERICA LLC; WASHINGTON
COUNTY; WASHINGTON COUNTY
COMMUNITY CORRECTIONS;
WASHINGTON COUNTY SHERIFF'S
OFFICE; WASHINGTON COUNTY
CIRCUIT COURT; OREGON JUDICIAL
DEPARTMENT; and STATE OF OREGON;
DOES 1-10.

Defendants.

) Case No. 3:24-CV-678

)
) JOINT STATUS REPORT, DISCOVERY
) PLAN AND PROPOSED CASE
) MANAGEMENT SCHEDULE

///

///

I. Conference of Counsel

The Parties hereby submit their Joint Status Report, Discovery Plan, and Proposed Case Management Schedule. Pursuant to Fed. R. Civ. P. 26(f), the Parties conferred by telephone on July 24, 2024.

II. Initial Discovery

Plaintiff and Defendants agreed to waive Initial Disclosures.

III. Early Alternative Dispute Resolution

The prospect of an alternative dispute resolution (“ADR”) is unknown at this time. The Parties expect to be able to conduct either a judicial settlement conference, court sponsored mediation, or private mediation before the close of expert discovery.

IV. Protective Order for Confidential Information

The Parties intend to submit a Stipulated Protective Order pursuant to Fed. R. Civ. Pro. 26(c).

V. Discovery Planning

- a. Discovery will be consistent with Fed. R. Civ. P. 26.
- b. Electronically Stored Information (“ESI”) will be requested in accordance with the discovery mechanisms permitted under the rules. The Parties agree that ESI may be produced in .pdf format. The Parties will work cooperatively to attempt to reach a consensus on the scope and protocols for such ESI, with consideration to the importance of the issue, the scope of the request in proportion to the needs of the case, the accessibility of the information, the burden of searching for and retrieving the information.

///

VI. Case Management Schedule

The Parties propose the following case management schedule:

Event	Proposed Deadline
Fact Discovery Cutoff	August 1, 2025
Fact Discovery Motions	July 1, 2025
Dispositive Motions	September 2, 2025
Joint ADR Report	30 days following rulings on dispositive motions
Initial Expert Disclosures	30 days following rulings on dispositive motions
Expert Discovery	30 days following rulings on dispositive motions
Pre-Trial Orders	30 days following rulings on dispositive motions
Trial	January 20, 2026, to January 30, 2026

DATED: July 29, 2024

Respectfully submitted,

By: /s/Erin Greenawald
Erin Greenawald, OSB No. 990542

By: /s/ Sean J. Riddell
Sean J. Riddell, OSB No. 013943
Attorneys for Plaintiff